KAIZEN
ISO CONSULTING

FREE RESOURCE · ISO 14001:2026 TRANSITION SERIES

ISO 14001:2026 Clause-by-Clause Change Reference Card

Every clause from 4.1 to 10.2: what changed from the 2015 edition and what to update. Keep it next to your transition plan.

Impact tags: NEW new auditable requirement - build or document something new
BROADENED same topic, expanded scope STRUCTURAL reorganized or renumbered, same obligation CLARIFICATION existing expectation made explicit EDITORIAL wording only, no practical change

CLAUSE	IMPACT	WHAT CHANGED / WHAT TO DO
4.1 Context	BROADENED	Five environmental conditions are now named in the requirement itself: pollution levels, availability of natural resources, climate change, biodiversity, and ecosystem health. Address each one explicitly in your context register - a documented low-relevance rationale is acceptable; silence is not.
4.2 Interested parties	CLARIFICATION	Needs that become compliance obligations must be addressed through the EMS. Verify each one traces to the compliance obligations register (6.1.3) and to an EMS process or control.
4.3 / 4.4 Scope / EMS	EDITORIAL	Vocabulary alignment only ("available as" documented information). No new obligations.
5.1 Leadership	CLARIFICATION	Top management support now extends to all relevant roles, not just management roles. Awareness update; no documentation change unless your manual quotes the old language.
5.2 Environmental policy	CLARIFICATION	Core requirements preserved; "fulfil" compliance obligations becomes "meet." Guidance now also mentions preservation or conservation of natural resources - worth considering at your next policy review.
5.3 Roles & authorities	EDITORIAL	Title shortened (dropped "Organizational"). Update cross-references when convenient.
6.1.1 General	STRUCTURAL	Now just the process umbrella for 6.1.2-6.1.5. Risk determination moved to 6.1.4; emergency situations moved to 6.1.2. Update cross-references.

6.1.2 Environmental aspects	CLARIFICATION	Normal and abnormal conditions are both named; emergency situations live here with a cross-reference to 8.2; aspect determination must account for planned changes (6.3). Verify your aspects register covers all three.
6.1.3 Compliance obligations	EDITORIAL	Vocabulary refresh only. Update procedure language at your next scheduled review.
6.1.4 Risks and opportunities	NEW	Now a dedicated sub-clause with its own documented-information requirement. Auditors will ask for a distinct, traceable deliverable. Create a standalone risks-and-opportunities register (or tag entries in an existing register) with each entry traced to a 4.1 issue, 4.2 need, 6.1.2 aspect, or 6.1.3 obligation, and linked to 6.1.5 actions.
6.1.5 Planning action	STRUCTURAL	Renumbered from 6.1.4; substance unchanged. Actions now explicitly integrate with 6.2, Clause 7, Clause 8, and 9.1. Update clause references.
6.2.1 Environmental objectives	CLARIFICATION	Objectives must be available as documented information - now baked into the attribute list. Confirm your objectives register is under formal document control with version history.
6.2.2 Actions to achieve objectives	EDITORIAL	Unchanged in substance; vocabulary refresh.
6.3 Planning of changes	NEW	Brand-new clause: EMS changes must be carried out in a planned, managed way. Create a documented management-of-change procedure (or extend your ISO 9001 one) with triggers, evaluation criteria, approvals, and records. Cross-reference from 6.1.2, 7.4.2, 7.5.3, 8.1, 9.2.2, and 10.2.
7.1-7.5 Support (all)	EDITORIAL	Least disruptive clause: resources, competence, awareness, communication, and documented information are all vocabulary-only updates. Nothing needs crash-updating; fold into your next document review cycle. New guidance lists communication principles (transparent, timely, truthful, factual, inclusive, understandable) worth adding to training.
8.1 Operational planning & control	BROADENED	"Outsourced processes" becomes externally provided processes, products, or services relevant to EMS outcomes - a wider supplier population (chemical suppliers, waste haulers, fleet leasing, contracted maintenance). Review suppliers against EMS outcomes, document relevance determinations and controls, update procurement terms and questionnaires. Leverage existing ISO 9001 supplier controls.
8.2 Emergency preparedness	EDITORIAL	Content unchanged; emergency situations now referenced from 6.1.2 instead of 6.1.1. Update cross-references only. Drills, communication plans, and testing requirements are the same.
9.1.1 Monitoring & measurement	CLARIFICATION	"Monitored and measured" becomes "monitored, measured and analysed," and EMS effectiveness is an explicit subject. Add an analysis method column to your monitoring plan; make sure management review translates data into trends.

9.1.2 Evaluation of compliance	EDITORIAL	Substantively unchanged ("fulfilment" becomes "meeting"). Vocabulary refresh only.
9.2.1 Internal audit - general	EDITORIAL	Unchanged.
9.2.2 Internal audit programme	CLARIFICATION	Audit objectives are now required alongside criteria and scope. Add an objectives field to your audit plan template and train auditors on the distinction: "verify conformance of operational controls to 8.1" is an objective; "audit Clause 8" is just scope.
9.3 Management review	STRUCTURAL	Split into 9.3.1 General, 9.3.2 Inputs, 9.3.3 Results. Same seven inputs; six enumerated results including integration-with-business opportunities and strategic-direction implications - the two most often overlooked. Re-template your agenda around 9.3.2 and minutes around 9.3.3, with a documented decision for each result area.
10.1 Continual improvement	STRUCTURAL	Old 10.1 General and 10.3 Continual improvement merged into a single 10.1. Same obligation; update cross-references.
10.2 Nonconformity & corrective action	EDITORIAL	The familiar flow is unchanged: react, evaluate cause(s), correct, verify effectiveness, update the EMS if needed. Vocabulary refresh only.

Terminology Shifts to Know

CHANGE	DETAIL
"Available as" vocabulary	"Maintain documented information" and "retain documented information as evidence" are replaced by the "shall be available as documented information" phrasing throughout. The document-vs-record distinction survives by context. Find-and-replace through your EMS manual, procedures, and audit checklists.
"Meet" replaces "fulfil"	Applies to compliance obligations everywhere, including the policy.
Deleted definitions	Standalone "risk" and "outsource" are gone. "Outsource" is replaced by externally provided processes, products, or services.
Promoted / new terms	"Stakeholder" is now an admitted term equal to "interested party." A generic "policy" definition is new.
Annexes	Annex A stays informative but is significantly expanded (context conditions, worked risk examples, sources of change, communication principles, external-provider controls). Annex B (2004 correspondence) is removed.

Update Priority at a Glance

PRIORITY	DOCUMENTS
Must update	Context register (4.1 five named conditions) · risks-and-opportunities register (6.1.4) · management-of-change procedure (6.3) · operational control and supplier procedures (8.1) · internal audit plan template (9.2.2) · management review agenda and minutes templates (9.3)

Should update	EMS manual · interested-parties register (4.2) · environmental aspects register (6.1.2) · supplier questionnaire (8.1) · monitoring and measurement plan (9.1.1) · training materials
Can wait for next review	Environmental policy (5.2) · compliance obligations register (6.1.3) · communication procedure (7.4) · document control procedure (7.5) · nonconformity and corrective action procedure (10.2)

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